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June 16, 2023

VIA ECF

Hon. Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

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Application granted on consent of the
Government.

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So Ordered: /s/

Hon. Lewis A. Kaplan, U.S.D.J.

RE: United States v. Heaven West, 21 Cr. 729 (LAK)

Dated: 6/21/2023

Dear Judge Kaplan:

I represent Heaven West in the above-referenced matter. I request an adjustment of Ms. West's bail conditions to allow her to possess personal identifying information of others as required by her current employment responsibilities.

Ms. West has the following bail conditions:

- Def. may not possess personal identifying information of others or create fraudulent documents.

Ms. West's current employment has expanded her responsibilities to include obtaining identification documents of job applicants, making copies of these documents, entering identification information into the employer's database, then returning the identification documents to the job applicants.

The Defense requests that the Court modify the conditions of her bail to allow Ms. West to possess personal identifying information for the sole purpose of her current job responsibilities. This modification will allow Ms. West to continue her employment. The Government does not object to this request.

Please contact me if you have any questions or concerns.

Very truly yours,

/s/ Emilee Sahli
Emilee A. Sahli, Esq.

CC: Michael Neff, Assistant United States Attorney (via email)
Marlon G. Kirton, Esq. (via email)



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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June 16, 2023

BY EMAIL

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Heaven West,
21 Cr. 729 (LAK)

Dear Judge Kaplan:

This afternoon, defendant Heaven West filed a bail modification motion, requesting that she be permitted to possess the personal identifying information of other individuals for the sole purpose of her current job responsibilities. (Dkt. 88). The Government has no objection to this request. Please let us know if anything further would be useful.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: Michael D. Neff
Michael D. Neff
Assistant United States Attorney
(212) 637-2107

cc: Marlon Kirton, Esq. (via email)